REMARKS

Claims 1-8 and 16-18 have been withdrawn from consideration.

Claims 9 and 10 are currently amended. Support for the amendment is found in original claims 9 and 10.

Claims 19-26 are added.

Support for new claims 19-20 is found in original claim 10.

Support for new claims 21-22 is found in original claim 12.

Support for new claims 23-24 is found in original claim 14.

Support for new claims 25-26 is found in original claim 15.

No new matter is added upon entry of the amendment.

Upon entry of the amendment, claims 1-26 will be active.

The rejection of claims 9-15 as being anticipated by [35 U.S.C. § 102(b)] or, in the alternative, as being obvious in view of [35 U.S.C. § 103(a)] Sugimura et al. (Sharp Corp., JP 2000-066432, which corresponds to US 6143453) is traversed. Sugimura's carboxylates are small molecules that are not covalently bonded to the polymer backbone. This is in contrast to the polycarboxylic acid polymer claimed herein, wherein the carboxylate functionalities are covalently bonded to the polymer backbone. Given this difference, it is noted that the two compositions are fundamentally different. Thus, it is requested that the Examiner withdraw the rejection in view of this fact and the following comments.

As noted in point (9) in the Specification on pages 5-6, Sugimura discloses an electrophotographic photoconductor that comprises an intermediate layer; wherein the intermediate layer contains an adhesive resin, a carboxylate, and titanium oxide (also see '453: col. 3, ll. 54-57; col. 6, ll. 53-63; and cols. 7-10). Sugimura's carboxylate is not covalently bonded to the polymer backbone. Instead, Sugimura's carboxylate is added to an organic solvent-containing adhesive resin/TiO_2 dispersion (col. 10, ll. 55-60 and Example 1

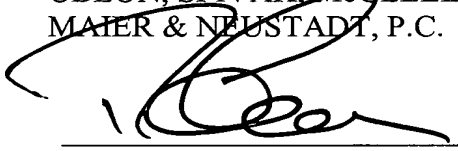
(col. 12, l. 64 – col. 13 l. 5) and mixed well. Removal of the organic solvent leaves a carboxylate-TiO_2-adhesive resin mixture, but the carboxylate does not become incorporated into the polymer backbone.

This is in contrast to the claimed invention, in which the intermediate layer contains a titanium oxide and a polycarboxylic acid polymer. As described in the Specification, a polycarboxylic acid polymer has carboxylate functionalities covalently bonded to the polymer backbone (for example, see p. 9). This is fundamentally different than that which is described by Sugimura. Therefore, it is requested that the Examiner withdraw the rejection.

It is believed that the claims are in a condition for allowance. An early and favorable indication is earnestly solicited.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Norman F. Oblon
Attorney of Record
Registration No. 24,618

Richard L. Treanor
Registration No. 36,379

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 08/03)

NFO:RLT:DRE